

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

DOCKET #92-77

RECEIVED

AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

Sheff J. Berg

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OFFICE of the SHERIFF
WYANDOTTE COUNTY
710 NORTH 7TH STREET
KANSAS CITY, KANSAS 66101
PHONE: (913) 573-2865
Fax: (913) 573-2972

BILL E. DILLON
SHERIFF

MICHAEL B. McDONALD
DETENTION ADMINISTRATOR

SENATOR ROBERT DOLE
UNITED STATES SENATE
WASHINGTON, D.C. 20515

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AUG 12 1994

FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

July 25, 1994

Dear Senator Dole,

It has come to my attention that the FCC has proposed certain regulations that will be detrimental to all County Jails and State prisons. I am referring to "Billed Party Preference For 0+ InterLata Calls" cc Docket 92-77. If this is adopted jails will lose their ability to control inmate fraud by phone, harassment of victims and witnesses by inmates, ability to "block" inmates from calling certain numbers and several other capabilities. In addition this proposed regulation will close off a source of income that my County relies upon to help fund our jail.

I am asking you to assist all Kansas Jails by working to keep this ill advised regulation from coming to pass. This will pass yet another unfunded mandate upon State and local government and will make the jobs of those charged with holding inmates that much more difficult.

Yours truly,

Michael B. McDonald

Michael B. McDonald
Detention Administrator

cc Vice-President Al Gore
Senator Nancy L. Kassebaum
Congresswoman Jan Meyers
Sheriff Bill E. Dillon
R. Wayne Lampson

FCC

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The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

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Sincerely,

Gary D. Holloway

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Sincerely,

Reed Hundt
Sheriff of Bates Co

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Tehama County Sheriff's Department

RUDY "MIKE" BLANUSA
SHERIFF

July 21, 1994

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street N.W.
Washington, D.C. 20554

Re: Billed Party Preference; CC Docket No. 92077

Dear Sir:

As the Sheriff of Tehama County I would like to express my opposition to the proposed "billed party preference" system for 0 + LATA payphone traffic rules.

I understand the need and concern for the public to be able to have choices with their carrier and the way they chose phone service. Under our current system they have the choice of not accepting phone calls. It is my responsibility to protect every citizen's right (this especially includes crime victims) to privacy which includes not being contacted by an incarcerated person if they so choose.

The responsibility for ensuring that our provider charges reasonable rates lies within the contractual agreements with our inmate phone service provider. With the B.P.P. in place only the large phone service carriers will remain and thus the smaller local providers will be forced out causing less competition and less sensitivity to the local needs.

The funds generated by the telephone commissions provide goods and services for inmates that will go unfunded if this revenue is lost. Substance abuse, basic literacy programs and adult education are but a few. These programs mandated by law and statute assist in the development of the basic skills needed to become productive members of society.

At a time of fiscal crisis in government the FCC should not be eliminating a critical source of revenue that is used to benefit our inmates.

Sincerely,


Rudy "Mike" Blanusa
Sheriff

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF DIRECTOR



Policy Div.

COB

June 28, 1994

Honorable Reed C. Hundt
Chairman
Federal Communications Commission
1919 M. Street, N.W.
Washington, D.C. 20554

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AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Chairman Hundt,

I am writing in regards to a recent letter to your office, date May 9, 1994, from America's Carriers Telecommunications Association ("ACTA"). In the letter, ACTA noted their opposition to the Common Carrier Bureau's rumored proposal to consider "rate caps" on OSP charges and listed ACTA members and other interested parties that share their views on this matter. Mistakenly, LinkUSA Corporation was listed as one such party.

LinkUSA opposes Billed Party Preference, believing that the costs of implementation far exceed the alleged consumer benefit. ACTA's views regarding a proposed "rate cap" are not shared by LinkUSA. We look forward to explaining our position further in comments submitted in response to the Further Notice of Proposed Rulemaking recently issued by the Commission.

Sincerely,

Kristi T. Feltz
Senior Vice President

cc: Honorable James Quello
Honorable Andrew Barrett
Honorable Rachelle Chong
Honorable Susan Ness
Richard Metzger, Acting Chief, Common Carrier Bureau
John Kane, President, ACTA

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Jim Schlichting - Policy Div

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June 28, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Honorable Reed C. Hundt
Chairman
Federal Communications Commission
1919 M. Street, N.W.
Washington, D.C. 20554

POLIC
PLAN

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Senior Vice President

cc: Honorable James Quello
Honorable Andrew Barrett
Honorable Rachelle Chong
Honorable Susan Ness
Richard Metzger, Acting Chief, Common Carrier Bureau
John Kane, President, ACTA

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THE PANTRY, INC.



BPP
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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

14 3 51 PM '94
P.O. BOX 1410, 1801 DOUGLAS DRIVE
SANFORD, NORTH CAROLINA 27331-1410
PHONE (919) 774-6700
FACSIMILES: (919) 775-5464
(919) 774-3329

July 5, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW - Room 814
Washington, D.C. 20554

Re: Billed Party Preference/CC Docket No. 92-77

Dear Chairman Hundt,

The Pantry, Inc. is a convenience store chain operating over four hundred locations in five states. As site owner, we currently contract with the Local Exchange Carrier (LEC's) or private owners to provide eight hundred and fifty public payphones to our customers.

We are writing to express our opposition to your agency's proposal to implement the costly Billed Party Preference ("BPP") regime throughout the telephone network. Our office is responsible for overseeing the operation of telecommunications facilities and services for The Pantry, Inc., including pay telephone and other telephone systems located at our facilities. BPP will drastically alter our ability to continue to provide the public with quality telecommunications service.

The FCC's Further Notice of Proposed Rulemaking for BPP short-sightedly assumes that the revenue sharing arrangements between providers of public communications services and operator services providers ("OSP") are unnecessary costs that do not benefit the public. Nothing could be further from the truth. The commission revenue we receive ultimately justifies our investment in space and maintenance to provide phone service to the public. BPP will cut off this critical source of funding. Without this necessary revenue stream, we simply could not afford to provide the public with the same level of calling opportunities that we currently provide. We are concerned that your staff has apparently overlooked this important and fundamental dynamic of the public communications industry.

Further, we require all of our payphone providers to be in compliance with the Telephone Operator Consumer Services Improvement Act of 1990 ("TOCSIA") to allow callers to access the carrier of their choice, and have spent substantial effort to assure that the consumer benefits of TOCSIA are fulfilled. BPP is clearly a redundant and unnecessary federal response to a problem that has already been effectively resolved.

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The Honorable Reed E. Hundt
July 7, 1994
Page 2

Indeed, BPP will impose new and unnecessary costs and inconvenience for consumers. BPP will cost billions to implement and will have continuing costs that consumers must ultimately bear. In addition, consumers will be faced with longer call set up times and will need to repeat billing information to two operators on some calls. In short, it is questionable what, if any, benefits consumers will see from BPP.

Moreover, it does not appear that the Commission has sufficiently addressed the high risk for increased fraud that will occur with BPP. Clearly, there are numerous LEC's, particularly those in rural areas that cannot afford to implement the enhanced screening features necessary to prevent fraud under BPP. Smaller long distance companies may likewise lack the ability to prevent the new opportunities for fraud that BPP will bring.

Competition and innovation will also be eliminated by BPP. Prior to competition from independent payphones and operator service providers the LEC's were the monopoly providers of public communications. Competition has brought new service options, greater responsiveness to our needs and fair commission structures. BPP will restore the LECs' bottleneck control over the initiation and routing of 0+ calls and enable them to further their own objectives at our expense.

Finally, like any other business, we are concerned about the rates charged to consumers, as such, we require our payphone providers and OSPs to only charge competitive rates. To the extent that the Commission feels certain consumers need additional protection, it would seem that the better alternative to BPP would be to establish and enforce reasonable rate ceilings.

Although on its face Billed Party Preference seems appealing, it suffers from numerous flaws. We respectfully ask the Commission to reject its Billed Party Preference proposal.

Thank you for your time and consideration.

Respectfully submitted,



Wayne Foushee
Administrative Manager

cc: The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness

THE PANTRY, INC.



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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

P.O. BOX 1410, 1801 DOUGLAS DRIVE
SANFORD, NORTH CAROLINA 27331-1410
PHONE (919) 774-6700
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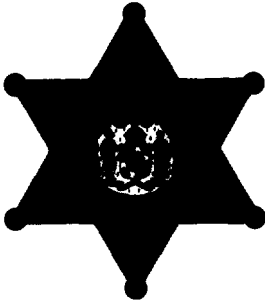
Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "T. L. Lehman", with a stylized flourish at the end.

Terry L. Lehman
Senior Vice President - Operations

cc: The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness



Office of the Sheriff
St. Mary's County

118 Tudor Hall Road
P. O. Box 1559
Leonardtown, Maryland 20650
301-475-8008



WAYNE L. PETTIT
SHERIFF

July 6, 1994

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AUG 12 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

92-77

Dear Chairman Hundt:

As the Sheriff and Warden of St. Mary's County, Maryland, I am writing to you and the other members of the Federal Communications Commission in hopes of persuading the Commission to exempt and exclude prisons and detention centers from inclusion in the proposed regulation known as Billed Party Preference (BPP) (CC Docket No. 92-77).

Both the Courts and the FCC have long recognized the unique environment that correctional institutions represent particularly in regard to controlling inmate access to, and use of, telephone services. To this end, I am seeking no more consideration than has historically been allowed for the following reasons.

First, BPP will undermine the ability of the St. Mary's County Detention Center to control inmate calling. Telephone fraud, abuse and harassment are unfortunately all too common in the correctional setting. I feel very strongly that we must be able to block certain numbers and alleviate third party calling which we can now do, however if BPP includes prisons and detention centers this essential inmate management tool is lost.

Second, BPP will alleviate certain revenues paid to St. Mary's County which now benefit the inmate population. In spite of what proponents of BPP have said, I know the types of essential programs and services these monies have funded and losing them will have a detrimental affect on this detention center and these people. In a relatively small county such as this, these funds can mean the difference between occupying inmates in a productive manner or requiring them to languish in their cells for lack of anything better to do. This is true, particularly in these lean economic times.

Finally, if one of the Federal Communications Commission's purposes is to ensure reasonable phone rates are charged for these calls, I can assure you, the intent of this office is not to profit

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Page 2

or in any way finance extravagant purchases, equipment or programs from such funds. Indeed, it would be unwise to charge an inordinate amount for this service as the ability of inmates to communicate is not only constitutionally guaranteed, but generally promotes good morale among the inmates which in turn fosters a less hostile environment.

I realize there has been voluminous comment and debate regarding the issue of Billed Party Preference. As a practitioner within the Corrections profession and more importantly as the individual responsible for the daily operation of an Adult Detention Center I trust that you will find these comments beneficial in your deliberations.

The motivation for expressing these views to the Federal Communications Commission is simple, our current system works; Billed Party Preference will not, at least not in the correctional setting.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wayne L. Pettit', written over a horizontal line.

Wayne L. Pettit
Sheriff

St. Mary's County, Maryland

WLP/DCD/mat

Sheriff's Department

Grundy County, Missouri
115 East 8th Street
Trenton, Missouri 64683
(816) 359-2828



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Greg A. Coon
Sheriff

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OFFICE OF THE SECRETARY

July 20, 1994

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Federal Communications Commission
1919 M Street, N.W.
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Sincerely,

Greg A. Coon

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August 1, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,


Name/Title Director

Anderson County Detention Center
Name of Correctional Facility

1009 County Home Road
Address
Anderson, SC 29625

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DOCKET FILE COPY ORIGINAL

JOE G. JONES, Sheriff

P.O. Box 57
Camden, NC 27921

July 23, 1994

Telephone: (919) 338-4176

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

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We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

No. of Copies rec'd 1
List ABCDE

Respectfully submitted,

Joe G. Jones Sheriff (Camden Co. N.C.)
Name/Title 2792

cc: The Honorable James H. Quello

Albemarle District Jail
Name of Correctional Facility

The Honorable Rachelle B. Chong

The Honorable Andrew C. Barrett

320 S. Hughes Blvd Elizabeth City, NC
Address 27909

The Honorable Susan Ness

DO NOT FILE COPY ORIGINAL RECEIVED

July 20, 1994

The Honorable Charles Grossley
United States Senate
Hart Bldg., Room 135
Washington, D. C. 20510

AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket #92-77

Dear Senator:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,



Max Allen
Poweshiek Co. Sheriff

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Page County Sheriff's Office

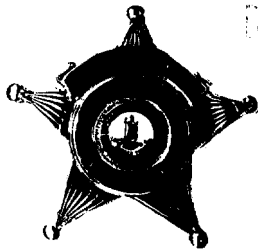
E. M. SEDWICK
Sheriff

P. E. MIMS
Chief Deputy

DEBBIE W. CASE

Secretary

August 1, 1994



DOCKET NO. 92-77

108 South Court Street
Luray, Virginia 22835
(703) 743-6571
FAX: (703) 743-1096

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

E. M. Sedwick
Name Title

No. of Copies rec'd 0
List ABCDE

Page Co. Sheriff's Office
Name of Correctional Facility

*108 S. Court St.
Luray, VA 22835*

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'AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

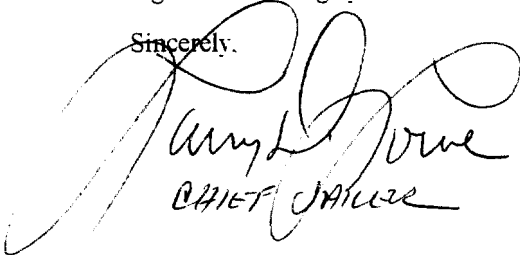
Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

Here are a few of my biggest concerns about Billed Party Preference:

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
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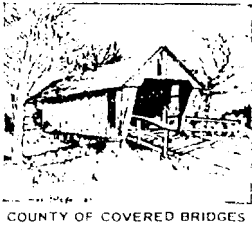
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Sincerely,


Amy L. Dine
CHIEF COUNSEL

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OFFICE OF

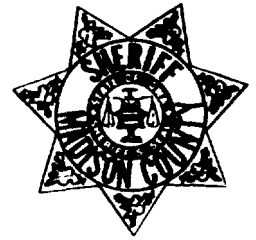
Sheriff of Madison County

PAUL D. WELCH, SHERIFF

LARRY B. ZEUTENHORST, CHIEF DEPUTY

PHONE: (515) 462-3575

1012 N. JOHN WAYNE DRIVE • WINTERSET, IOWA 50273



July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

DOCKET FILE EXTENSION

RECEIVED

AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket #92-77

Dear Chairman Hundt:

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Sincerely,

No. of Copies rec'd
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Paul D. Welch, Sheriff
Madison County

July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket #92-77

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Sincerely,

Bill Thae
Sheriff

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July 20, 1994

The Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D. C. 20554

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Sincerely,

Mike Ruden
Tama County Sheriff

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NEVADA PAYPHONE ASSOCIATION

June 30, 1994

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AUG 11 2 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW - Room 814
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Billed Party Preference/CC Docket No. 92-77

Dear Chairman Hundt:

We are writing to express our opposition to your agency's proposal to implement Billed Party preference ("BPP") throughout the telephone network. Our association represents several independent payphone providers ("IPP's") in the state of Nevada. We are responsible for procuring and overseeing the operation of telecommunications facilities and services, including pay telephone and other telephone systems located at our facilities. BPP will drastically alter our ability to continue to provide the public with quality telecommunications service.

Our phones are all programmed to allow callers to access the carrier of their choice, in compliance with the Telephone Operator Consumer Services Improvement Act of 1990 (TOCSIA). BPP is in our opinion an unnecessary federal response to a problem that has already effectively been resolved.

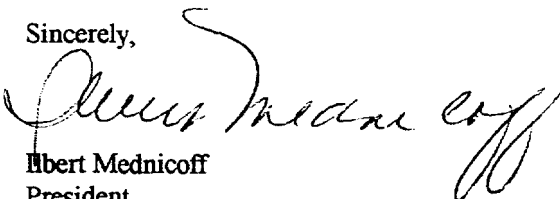
BPP will cost billions to implement and the consumers will ultimately bear the cost. Additionally, consumers will be faced with longer call set up times and will need to repeat billing information on some calls.

BPP will effectively eliminate competition and innovation. Prior to deregulation the local exchange carriers ("LEC's") were the monopoly providers of public communications. Competition has brought new service options, greater responsiveness to our needs and fair commission structures. BPP will allow the LEC's total control over the initiation and routing of 0+ calls and enable them to further their own objectives at our expense.

As in any business, we are concerned about the rates charged to consumers. We require our payphone providers and OSP's to only charge competitive rates. If the Commission feels consumers need additional protection, it would seem that a better alternative to BPP would be to establish and enforce reasonable rate ceilings.

We respectfully ask the commission to reject the Billed Party preference proposal.

Sincerely,

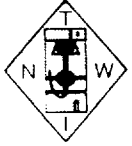


Albert Mednicoff
President

IM/dtj

cc's The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness

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TELCO NORTHWEST, INC.

15838 S.W. Upper Boones Ferry Rd. • Lake Oswego, OR 97035 • (503) 620-3173

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June 30, 1994

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Reed H. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW - Room 814
Washington, DC 20554

RE: Billed Party Preference/CC Docket No. 92-77

Dear Chairman Hundt:

I am writing this letter to your agency to register our opposition to Billed Party Preference (BPP.)

Our Company operates approximately 1000 coin operated pay telephones in five states. BPP would make it very difficult to continue providing good service to the consumer.

We now allow callers to access the carriers of their choice. BPP, in our opinion, is an unnecessary response to a problem that has been resolved.

We respectfully ask the commission to reject the Billed Party Preference proposal.

Sincerely,

TELCO WEST, INC.

EVERT G. BROWN

EGB/ms

cc's The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness

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PACIFIC TELCOM

PAY TELEPHONE OWNERS AND OPERATORS

MEMBER

NORTH AMERICAN TELECOMMUNICATIONS ASSOCIATION

AMERICAN PUBLIC COMMUNICATIONS COUNCIL

CALIFORNIA PAYPHONE ASSOCIATION

NEVADA PAYPHONE ASSOCIATION

RECEIVED

AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

June 30, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communication Commission
1919 M Street NW - Room 814
Washington, D.C. 20554

RE: Billed Party Preference/CC Docket No. 92-77.

I must express our opposition to your agency's proposal to implement the costly Billed Party Preference (BPP). We own and operate pay telephones in California and Nevada and BPP will drastically alter our ability to continue to provide the public with quality telecommunication service.

All our phones are programmed to be in compliance with the Telephone Operator Consumer Services Improvement Act of 1990 (TOCSIA) to allow callers to access the carrier of their choice. BPP is clearly a redundant and unnecessary federal response to a problem that has already been effectively resolved.

BPP will impose new and unnecessary costs and inconvenience for consumers. Consumers will be faced with longer call set up times and will need to repeat billing information to two operators on some calls.

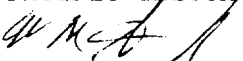
The commission must address the high risk for increased fraud that will occur with BPP. There are numerous local exchange carriers (LEC) that cannot afford to implement the enhanced screening features necessary to prevent fraud. Smaller long distance companies may also lack the ability to prevent the fraud that BPP will bring.

Competition and innovation will be eliminated by BPP. Prior to competition from independent payphones and operator service providers the LECs were the monopoly providers for communication needs. BPP will restore the LEC's bottleneck control over the initiation and routing of 0+ calls and enable them to further their own objectives at our expense.

As any other business, we are concerned about the rates charged to consumers. If the Commission feels consumers need more protection it would seem that the better alternative to BPP would be to establish and enforce reasonable rate ceilings.

We respectfully ask the Commission to reject the BPP proposal. Thank you for your time and consideration.

Sincerely,
PACIFIC TELCOM


W. M. Jarrett, Jr., President

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